

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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S.D. OF N.Y.

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KRISTY WAGNER,

PLAINTIFF,

v.

AKIN GUMP STRAUSS HAUER & FELD LLP,

DEFENDANT.  
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Case No.: 16-cv-3532

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 9/19/16
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**SECOND MOTION FOR IMMEDIATE INJUNCTIVE RELIEF**


In light of all facts and circumstances, each person has been obligated and remains compelled to **continue to take any and all immediate action** to cause: (i) immediate payment of **\$17,333,959** to the following account (in lawful currency of the United States of America), for the benefit of Kristy M. Wagner: Routing Number: 026009593; Account Number: 435025754029; Bank of America NA, 222 Broadway, New York, New York 10038; (ii) immediate cessation and continued prevention of violation of law and deprivation(s) of rights, including without limitation: the Constitution of the United States of America; the District of Columbia Human Rights Act, as codified D.C. Code § 2-1402; Americans with Disabilities Act of 1990, as codified 42 U.S.C.A. § 12112 *et seq.*; Title VII of the Civil Rights Act of 1964, as codified 42 U.S.C.[A.] § 2000e *et seq.* (1988); and the Equal Pay Act, as codified 29 U.S.C.[A.] § 206(d)(the foregoing, together with the Age Discrimination in Employment Act of 1967, codified at 29 U.S.C. § 621 *et seq.*, the "Relevant Laws"); (iii) continuing protection of funds, amounts, assets and intangibles such that Kristy M. Wagner need never fear or experience deprivation or diminution of any of the foregoing; (iv) without limiting the text or effect of this Second Motion for Immediate Injunctive Relief, the cessation of theft and other harm suffered by Kristy M. Wagner as a result of the actions and inactions of Lisa Wagner Sandhaus; (v) other than those actions and inactions confirmed to be

understood and directly authorized by Kristy M. Wagner (solely upon presentation made directly to Kristy M. Wagner of true and correct identification and authority of said approaching individual), allow, witness or otherwise directly or indirectly permit to occur any action or inaction vis-à-vis Kristy M. Wagner; (vi) worldwide distribution (by and through written and all other media) of information regarding the fact that Adam Seth Umanoff and Edward Zaelke (collectively, the "**Perpetrators**") have committed serious crimes, that their immediate prosecution and incarceration was sought by and on behalf the United States of America, and that any and all persons having information relating to one or both Perpetrators must immediately report same to the United States of America, including by direct notification to the Federal Bureau of Investigations and the Central Intelligence Agency (for these purposes, the "**Effectuating Agency**"); (vii) cause the immediate prosecution and maximum security incarceration of said Perpetrators, such that the Perpetrators remain under the (direct or indirect) supervision of the Department of Corrections, within maximum security prisons for a duration of not less than five (5) continuous years, without adjustment or credit for any factor(s) whatsoever; and (viii) cause the transfer and correction of title (including, without limitation, with respect to accounts, property and other financial instruments) such that any and all monies, funds and other items of value at any time belonging to one or both Perpetrators (including anything and everything one or both Perpetrators has benefitted from and/or laid claim to) shall belong to and inure to the benefit of Kristy M. Wagner; the President of the United States may approach Kristy M. Wagner in person for the sole purpose of requesting that Kristy M. Wagner acknowledge her understanding that each and every action described in this document has lawfully occurred (with or without such person(s) as has previously been designated and authorized to take lawful action on behalf of the United States of America). If the President of the United States does not personally approach Kristy M. Wagner in person for the sole purpose set forth in the immediately preceding sentence, (1) and (2) shall occur simultaneously:

- (1) such person as has previously been designated and authorized to take lawful action on behalf of the United States of America may approach Kristy M. Wagner, in person, for the sole purpose of requesting that

- (1) Kristy M. Wagner acknowledge her understanding that each and every action described in this document has lawfully occurred; and
- (2) a person personally known by Kristy M. Wagner (said person, the "Witness") and previously authorized under United States law shall identify said person referenced in (1); and make statements relating solely to the Witness' actual knowledge of said designation and authority referred to therein

Date: September 19, 2016

  
Kristy M. Wagner